

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

MIRANDA WILSON,
Plaintiff

V.

LIBERTY MUTUAL GROUP INC.,
Defendant

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CIVIL ACTION NO. 16-484

JOINT MOTION TO DISMISS WITH PREJUDICE

TO THE HONORABLE COURT:

NOW COME Miranda Wilson, Plaintiff herein, and Liberty Mutual Group Inc., Defendant herein, by and through their respective counsel, and jointly move the Court to dismiss with prejudice all claims of Miranda Wilson and for such would show as follows.

1.

Plaintiff Miranda Wilson and Defendant Liberty Mutual Group Inc., would represent to the Court that all claims and causes of action asserted herein by the Plaintiff Miranda Wilson against the Defendant Liberty Mutual Group Inc. have been fully compromised and settled by and between Plaintiff Miranda Wilson and Defendant Liberty Mutual Group Inc.. Accordingly, Plaintiff Miranda Wilson and Defendant Liberty Mutual Group Inc. desire to have all of Plaintiff's claims and causes of action asserted herein be dismissed *with prejudice* to the rights of Plaintiff Miranda Wilson to hereafter reassert or refile any claim or cause of action asserted or which could have been asserted herein against Defendant.

2.

The Court is further requested to tax all costs of Court against the party incurring same.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Miranda Wilson and Defendant Liberty Mutual Group Inc. respectfully request that all claims and causes of action asserted herein by Plaintiff against Defendant be dismissed with prejudice, that all costs be taxed against the party incurring same, and that the Court enter such other orders as it deems necessary for justice under the premises.

Respectfully submitted,



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